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**From:** Snyder, Erik [snyder.erik@epa.gov]  
**Sent:** 10/22/2018 1:47:01 PM  
**To:** Feldman, Michael [Feldman.Michael@epa.gov]; Imhoff, Robert [imhoff.robert@epa.gov]  
**Subject:** RE: Problem in TX error-correction FRN?  
**Attachments:** Luminant monitors ltr to TCEQ signed.pdf

Here is the monitor location letter that we did before the official Annual Network Review.

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EPA Region 6  
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**From:** Feldman, Michael  
**Sent:** Monday, October 22, 2018 8:32 AM  
**To:** Imhoff, Robert <imhoff.robert@epa.gov>  
**Cc:** Snyder, Erik <snyder.erik@epa.gov>  
**Subject:** RE: Ex. 5 Deliberative Process (DP) TX error-correction FRN?

[https://www.tceq.texas.gov/assets/public/implementation/air/sip/so2/SO2\\_Source\\_Characterization\\_6-29-16.pdf](https://www.tceq.texas.gov/assets/public/implementation/air/sip/so2/SO2_Source_Characterization_6-29-16.pdf)

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**From:** Imhoff, Robert  
**Sent:** Monday, October 22, 2018 8:07 AM  
**To:** Feldman, Michael <Feldman.Michael@epa.gov>  
**Cc:** Snyder, Erik <snyder.erik@epa.gov>  
**Subject:** Ex. 5 Deliberative Process (DP) TX error-correction FRN?

The FRN contains the following timeline.

On June 29, 2016, timely meeting its DRR option selection deadline, Texas separately communicated to the EPA that it had chosen the monitoring pathway for these areas to meet its obligations to characterize air quality for the sources in these areas that were listed under the DRR. In Texas' annual monitoring network plan for 2016, the state indicated that it intended to site new SO<sub>2</sub> monitors in any Round 2 area that the EPA designated as nonattainment. Following up on this intention, in its 2017 annual monitoring network plan, Texas included new proposed SO<sub>2</sub> monitoring sites in Freestone, Titus, and Rusk Counties to assess air quality in the three new SO<sub>2</sub> nonattainment areas involving Vistra Energy sources. Texas referred to the 2016 Sierra Club modeling analysis, among other information, to inform their proposed siting of the new monitors,

but stated: “The use of the 2016 Sierra Club modeling analysis for possible monitor placement decisions does not infer TCEQ’s concurrence with the use of this modeling analysis for any other purpose.”<sup>[1]</sup> The EPA approved the three monitor siting proposals in an August 10, 2017, letter to TCEQ.<sup>[2]</sup>

## Ex. 5 Deliberative Process (DP)

-Bob

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<sup>[1]</sup> Appendix E: Sulfur Dioxide Data Requirements Rule Monitor Placement Evaluations, from 2017 TCEQ Annual Monitoring Network Plan.

<sup>[2]</sup> TCEQ subsequently deployed SO<sub>2</sub> monitors near Big Brown on October 30, 2017, and near Martin Lake on November 1, 2017. No monitors were deployed in the area around Monticello as the source was retired on February 8, 2018 (*see* 2018 TCEQ Annual Monitoring Network Plan).